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May 5, 2020

VIA ECF

Hon. Ann M. Donnelly, U.S.D.J United States District Court Eastern District of New York 225 Camden Plaza East Brooklyn, NY 11201

Re: Gomez v. Lamanna

Case No. 1:18-cv-07252-AMD-LB

Dear Judge Donnelly:

I am counsel to petitioner Ynmaculada Gomez ("Petitioner") in the above-referenced action. I am writing to request an extension of three (3) weeks to submit Petitioner's revised petition for a writ of habeas corpus, making the revised petition due on May 29, 2020. As a result of the COVID-19 lockdown, my office has been unable, to this point, to devote the time necessary to make a sufficiently thorough submission on Petitioner's behalf. In addition, I only recently received the entire transcript of Petitioner's trial. I note that counsel for Respondent has not yet made an appearance, so there would be no prejudice to my adversary if the extension were granted.

The Court's attention to this matter is greatly appreciated.

STEPHÉN N. DRATCH

Respectfully submitted,

SND/dam

cc: Jahoney Gomez Via email jahoney@gmail.com

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